

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

THE MIDDLE EAST FORUM : CIVIL ACTION  
:   
v. : No. 19-5697  
:   
LISA REYNOLDS-BARBOUNIS :

**ORDER**

AND NOW, this 25th day of June, 2020, following multiple telephone conferences to address Defendant's compliance with her discovery obligations, including a telephone conference on June 17, 2020, and it appearing to the Court that it is just and proper to do so, it is hereby ORDERED that:

1. On or before 5:00 p.m. EST on Monday, June 29, 2020, Capsicum Group, LLC ("Capsicum") shall deliver electronic copies, or images, of Defendant's two iPhone devices and any other devices received from Plaintiff (the "Devices") in its possession to Cornerstone Discovery ("Cornerstone") (attention Lou Cinquanto) in a format acceptable to Cornerstone and in a format which preserves and does not alter any and all existing metadata.
2. On or before 5:00 p.m. EST on Monday, June 29, 2020, counsel for Defendant shall identify and supply Cornerstone with Defendant's ("Barbounis") account usernames and passwords for Google accounts (including but not limited to Gmail, Google Drive, and Google Hangouts) for lisa.e.reynolds@gmail.com and lisabarbounis@gmail.com, ProtonMail, Facebook (including but not limited to Facebook Messenger), Twitter, Instagram, WhatsApp, Signal, Telegram, Wickr, iCloud, and Dropbox (collectively, the "Accounts"). To the extent the Accounts require two-factor authentication, Barbounis shall promptly cooperate with Cornerstone to provide all codes required to gain access to the Accounts.
3. On or before 5:00 p.m. EST on Monday, June 29, 2020, Plaintiff shall supply

Cornerstone with a list of no more than twenty-five (25) search terms.

4. On or before 5:00 p.m. EST on Monday, July 6, 2020, Cornerstone shall search Defendant's Devices and Defendant's Accounts (including but not limited to e-mails, chats, messages, texts, and attachments to such communications) using the search terms contained in Plaintiff's search term list. Cornerstone shall then provide to both parties a "hit list" identifying the number of times (including the zero hits) each individual search term included in Plaintiff's list appeared in the Devices and Accounts. Cornerstone shall also then upload the documents, images, e-mails, chat messages, attachments, natives, call logs, and all other resulting files to a database that is easily and remotely accessible, reviewable to both parties, and in a format which preserves and does not alter any and all existing metadata.

5. Cornerstone shall only exclude from its upload from these Devices and Accounts the following: (1) emails, texts, voicemails, and other communications to or from Seth Carson, Derek Smith Law Group (e-mail: seth@dereksmithlaw.com and phone: 484-678-2210), but Cornerstone shall retain these possibly privileged communications so that Defendant's counsel may prepare a Privilege Log to provide to Plaintiff's counsel within twenty (20) days after the date of this Order; and (2) Barbounis' personal photographs and videos that do not contain images of documents.

6. With respect to audio files, voice recordings, screenshots, and images of documents (which are not searchable by using word terms), Cornerstone shall upload those materials to the database, reviewable only by counsel for both parties "attorneys' eyes only" for a period of thirty (30) days. To the extent there is any dispute during those thirty days about whether these materials should remain attorneys' eyes only, the parties shall bring that matter to the Court's attention.

7. Plaintiff shall bear the costs associated with Cornerstone searching Defendant's Devices and Accounts and hosting such information in a database mutually accessible to the parties.

8. Within twenty-one (21) days after Cornerstone uploads the documents for access by both parties, all data, images, documents, videos, voice recordings, and other information obtained from the Devices and Accounts may be designated by either party in accordance with the Protective Order entered by this Court on June 12, 2020.

SO ORDERED this 25th day of June, 2020.

BY THE COURT:

/s/ Juan R. Sánchez  
Juan R. Sánchez, C.J.